



RURAL TELEPHONE SERVICE CO., INC.

Your One-Stop Communications, Information and Entertainment Source

February 5, 2010

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36

Annual 47 C.F.R. Section 64.2009(e) CPNI Certification for 2009

Rural Telephone Service Company, Inc.

Form 499 Filer ID #804438

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 15, 2010, *EB Provides Guidance on Filing of Annual Customer Proprietary Network Information (CPNI) Certifications Under 47 C.F.R. §64.2009(e)*, *EB Docket No. 06-36*.

I, Rhonda S. Goddard, certify that I am Chief Operating Officer of Rural Telephone Service Company, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. Section 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under the Title 18 of the U.S. Code and may subject it to enforcement action.

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As directed, a copy of this report has been submitted to Best Copy and Printing, Inc. All inquiries in connection with this filing should be addressed to our office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rhonda S. Goddard".

Rhonda S. Goddard
Chief Operating Officer
Rural Telephone Service Company, Inc.

RSG/ckw

Attachments: Accompanying Statement explaining CPNI procedures

cc: Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

Statement of CPNI Operating Procedures

Rural Telephone Service Company, Inc.

Rural Telephone Service Company, Inc. hereby submits that its procedures regarding its Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 C.F.R. §§64.2001-64.2009.

Rural Telephone Service Company, Inc. uses its CPNI in compliance with the Commission's rules in 47 C.F.R. §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, depending upon use, has given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage.

Rural Telephone's employees, including marketing, sales and customer service representatives, have been educated about CPNI, federal regulations and Rural Telephone's statutory responsibility to its customers. Any unauthorized use, sale, or other disclosure of CPNI by any employee would subject the employee to disciplinary action. For the first violation, an employee would be given a warning and the violation would be noted on the employee's record. A second violation would result in termination of employment.

By accessing company records, employees may easily determine the CPNI status of individual customers prior to using CPNI. Rural Telephone Service Company, Inc. maintains a written log regarding outbound usage of CPNI, including a description of the marketing activity, which products and/or services were marketed, and the specific CPNI used. All sales and marketing personnel obtain supervisor approval for any outbound usage of CPNI. Rural Telephone Service Company, Inc. does not sell, rent or otherwise disclose CPNI to non-affiliated entities. If Rural Telephone's affiliates are allowed to access CPNI, such disclosure is noted in the written log.

In compliance with the Commission's rules, Rural Telephone Service Company, Inc. does not use, disclose or permit access to CPNI for the purposes of identifying customers placing calls to competing carriers. Furthermore, Rural Telephone has implemented appropriate safeguards for the disclosure of CPNI, including instituting procedures to (1) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact, online account access, or an in-store visit (e.g., use of verbal or online passwords without the use of readily available biographical or account information, or requiring a valid photo ID matching the customer's account information); and (2) providing notification to customers of account changes. Rural Telephone has also established procedures to notify law enforcement in the event of a breach of CPNI.

**2009 ANNUAL CERTIFICATION – Customer Proprietary Network Information
Procedures of Rural Telephone Service Company, Inc.**

I, Rhonda Goddard, hereby certify that I have personal knowledge that Rural Telephone Service Company, Inc. has established operating procedures regarding the Customer Proprietary network Information generated by the customers of Rural Telephone Service company, Inc. These procedures, described on the attached pages, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2011.

Signed: 

By: Rhonda S. Goddard
Chief Operating Officer-Regulated

Date: 12/31/2009